

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>23-</u>
v.	:	DATE FILED: _____
VALENTIN LUBINSKI	:	VIOLATIONS:
	:	18 U.S.C. § 2422(b) (use of an interstate
	:	commerce facility to entice a minor, and
	:	attempt to entice a minor, to engage in
	:	sexual conduct – 18 counts)
	:	18 U.S.C. § 2251(a) (manufacture and
	:	attempted manufacture of child
	:	pornography – 18 counts)
	:	18 U.S.C. § 2(b) (willfully causing)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about June 23, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #1, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 23, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #1, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #1 to photograph herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 28, 2022 and on or about June 29, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #2, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 28, 2022 and on or about June 29, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #2, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #2 to photograph herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 17, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #3, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 17, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #3, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #3 to photograph herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 18, 2022 and on or about June 23, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #4, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 18, 2022 and on or about June 23, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #4, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #4 to photograph and video-record herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 18, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #5, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 18, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #5, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #5 to photograph and video-record herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 20, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #6, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 20, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #6, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #6 to photograph and video-record herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 20, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #7, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 20, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #7, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #7 to photograph and video-record herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 21, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #8, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 21, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #8, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #8 to photograph and video-record herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 21, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #9, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 21, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #9, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #9 to photograph herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 21, 2022 and on or about June 24, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #10, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 21, 2022 and on or about June 24, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #10, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #10 to photograph and video-record herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 23, 2022 and on or about June 24, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #11, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 23, 2022 and on or about June 24, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #11, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #11 to photograph and video-record herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 26, 2022 and on or about June 27, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #12, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 26, 2022 and on or about June 27, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #12, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #12 to photograph and video-record herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 26, 2022 and on or about June 27, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #13, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 26, 2022 and on or about June 27, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #13, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #13 to photograph and video-record herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 26, 2022 and on or about June 28, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #14, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 26, 2022 and on or about June 28, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #14, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #14 to photograph and video-record herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 28, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #15, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 28, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #15, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #15 to photograph herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 28, 2022 and on or about June 30, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #16, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 28, 2022 and on or about June 30, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #16, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #16 to photograph herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 28, 2022 and on or about June 29, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #17, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 28, 2022 and on or about June 29, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #17, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #17 to photograph herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 28, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

used a means and facility of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice, and coerce Minor #18, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacturing of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 28, 2022, in the Eastern District of Pennsylvania, and elsewhere,
defendant

VALENTIN LUBINSKI

employed, used, persuaded, induced, enticed and coerced Minor #18, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused the same, that is, by soliciting Minor #18 to photograph and video-record herself engaging in sexually explicit conduct and transmit the images via the Internet, and defendant LUBINSKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, the Internet.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 2422(b) and 2251(a), as set forth in this indictment, defendant

VALENTIN LUBINSKI

shall forfeit to the United States of America:

(a) any visual depiction, or any film, videotape, or other matter which contains any child pornography, which was produced, transported, mailed, shipped, or received as a result of such violations as charged in the indictment;

(b) any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly from such violations; and

(c) any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violations.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 2428 and

2253, to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 2428 and 2253.

A TRUE BILL:


GRAND JURY FOREPERSON



JACQUELINE C. ROMERO
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

VALENTIN LUBINSKI

INDICTMENT

Counts

**18 U.S.C. § 2422(b) (use of an interstate commerce facility to entice a minor,
and attempt to entice a minor, to engage in sexual conduct – 18 counts)**

18 U.S.C. § 2251(a) (manufacture and attempted manufacture of child pornography – 18 counts)

18 U.S.C. § 2(b) (willfully causing)

Notice of forfeiture

A true bill.

Filed in open court this Second day,
Of February A.D. 20 23

Clerk

Bail, \$ _____
